

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SANDRA LIFSCHITZ, Individually and on Behalf of All Others Similarly Situated,)	Civil Action No.
)	08 Civ. 6394 (RMB)
)	
Plaintiff,)	
vs.)	
)	
HEXION SPECIALTY CHEMICALS, INC., CRAIG O. MORRISON, and JOSHUA J. HARRIS,)	
)	
)	
Defendants.)	
)	

**LEAD PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT, CONDITIONAL
CERTIFICATION OF SETTLEMENT CLASS, APPROVAL OF
NOTICE, AND SCHEDULING OF FAIRNESS HEARING**

Lead Plaintiffs, Sandra Lifschitz and Robert Burch, by their undersigned Lead Counsel, respectfully move this Court for an order granting preliminary approval of the proposed settlement (the "Settlement") of this class action (the "Action"), scheduling a fairness hearing ("Fairness Hearing"), directing that class members be notified of the Settlement and of their rights with respect thereto, and for related relief (proposed "Preliminary Order"). In support thereof, Lead Plaintiffs file the accompanying Memorandum.

A proposed form of "Preliminary Order" is attached as Exhibit A to the "Stipulation of Settlement" being submitted herewith.

Dated: 12/9/09

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